

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

SAN ANGELO DIVISION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TX
FILED

Lanny Marvin Bush

(

2019 FEB 25 PM 3:51

)

vs.

(

DEPUTY

cause no; 6:19-cv-00006-C

PSR

)

Collier, Director ,TDCJ

)

MOTION FOR APPOINTMENT OF COUNSEL

Pursuant to 28 U.S.C. § 1915(e)(1), Petitioner/Plaintiff, Lanny Marvin Bush, Moves for an Order appointing Counsel to represent him in this Case. In Support of this Motion Petitioner/Plaintiff states,.....

1. Petitioner is unable to afford counsel. He has asked to leave to proceed in forma pauperis.

2. Petitioner's imprisonment will greatly limit his ability to litigate and Present sufficient facts and Documents required for the Court to Properly Consider the Issues at hand. Several Documents are in the possession of the Police department, that refuses to provide them to the Petitioner. These documents support Petitioners grounds.

3. The issues are extremely complex , and will require significant research and investigation, that Plaintiff/ Petitioner does not have.

4. Counsel would better enable Petitioner/ Plaintiff the opportunity to gather needed documents and evidence that will support his Grounds.

5. Counsel would reduce the courts time and attention to this case and would greatly uncover the errors involved to show the Courts.

WHEREFORE PREMISIS CONSIDERED, Plaintiff/Petitioner request the Court Appoint Counsel to aid and Assist in this Matter.



Lanny Marvin Bush Pro-Se
2664 FM 2054
Tennessee Colony, Tex. 75886

CERTIFICATE OF SERVICE

I hereby certify that on this date, I forwarded a copy of the foregoing documents Motion for Appointment of Counsel, to United States District Court, the attorney for the defendants at the address of 33 E. Tawak - Room 202, San Angelo, TX, 76906.

Done this 19 DAY OF February 2019.

Lanny Bush
Lanny H. Bush 1917810

Pro-Se

Lanny H. Bush
2664 FM 2054
Tennessee Colony, Tx 75966